

**ATTACHMENT A**  
**Statement of Facts**

*The United States and the Defendant, Jamaar Davon BRANDON, stipulate and agree that if this case proceeded to trial, the United States would prove the facts set forth below beyond a reasonable doubt. They further stipulate and agree that these are not all of the facts that the United States would prove if this case proceeded to trial.*

At all times relevant to this case, the Defendant, **JAMAAR DAVON BRANDON** ("**BRANDON**"), was a resident of Waldorf, Maryland. From at least October 2012 through at least June 2015, **BRANDON** used email, cloud storage programs, peer-to-peer file sharing programs, internet chat messaging, and other internet-based programs to distribute and receive child pornography.

On October 18, 2012, VideoBam.com reported to the National Center for Missing and Exploited Children ("NCMEC") that a user utilizing an Internet Protocol ("IP") address registered to **BRANDON**'s residence in Waldorf, Maryland had uploaded a video file containing suspected child pornography to VideoBam.com. VideoBam.com included with its report a total of 56 video files uploaded by the user for NCMEC and law enforcement review. Law enforcement confirmed that seventeen of the videos contained child pornography, including the following video, among others:

- **afrobelka.3gp** – The video depicts an African American adult male, seen from the waist up, inserting his penis into the rectum and vagina of a pre-pubescent African American female child. The female is seen lying on her stomach on a bed while being penetrated by the adult male penis.

On October 19, 2012, a state search warrant was executed at **BRANDON**'s residence in Waldorf, Maryland. Pursuant to the search warrant, members of law enforcement seized, among other items, an Asus laptop computer belonging to **BRANDON**, which was located in **BRANDON**'s bedroom. A forensic review of the Asus laptop found approximately 700 digital files of interest, the majority of which were confirmed to be child pornography and child erotica. Three of the digital files were videos registered with the NCMEC Child Victim Identification Program ("CVIP"), meaning that the identities of the victims have been confirmed by law enforcement and maintained in NCMEC systems of record. Some of these image files and videos portrayed sadistic and masochistic conduct and other depictions of violence. The following is a brief description of one of the CVIP-registered videos found on **BRANDON**'s laptop:

- **1-Jho-SAMix (PTHC)(R@y gold).mpeg** – The video is approximately 47 minutes 33 seconds in length and depicts numerous pre-pubescent and pubescent Caucasian female children, possibly the same victim, engaging in a variety of sexual acts with adult Caucasian men, including vaginal intercourse and oral sex.

Also on October 19, 2012, **BRANDON** waived his *Miranda* rights and agreed to be interviewed by members of law enforcement. **BRANDON** admitted that he had been



downloading and distributing child pornography for approximately one year. **BRANDON** indicated to law enforcement officers that he masturbated to the videos and preferred viewing young African American females engaged in different sex acts. **BRANDON** further admitted that he knew some of the children in the videos were as young as 8-years-old. **BRANDON** also admitted to sharing child pornography via the Internet using various mediums including, but not limited to, VideoBam.com and peer-to-peer file sharing networks. In addition, **BRANDON** admitted that he would download child pornography from the Internet and save the files to his computer and his external hard drive. At the conclusion of this interview, **BRANDON** was released. Shortly thereafter, local authorities referred the matter to the Federal Bureau of Investigation, which continued to investigate.

On June 12, 2013, **BRANDON** received an email at email address jdb1000z@gmail.com from an individual in Chicago, Illinois that contained 34 attached files containing images of children engaged in sexually explicit conduct, including images depicting the lascivious exhibition of the vaginal area of toddler-aged and prepubescent females.

On June 13, 2013, **BRANDON**, using the email address jdb1000z@gmail.com, distributed the following video and image of children engaged in sexually explicit conduct to an individual in Chicago, Illinois via email:

- An image portraying an African American toddler-aged female performing oral sex on an African American male while the male's left hand is placed behind the toddler's head.
- **Video.MOV** – The video is 48 seconds in length and depicts a clothed African American pre-pubescent female who removes her pants in order to pose in a manner that exposes her vagina and buttocks. The female uses her fingers to spread her buttocks in order to fully expose her genitalia and inserts a finger into her anus.

On March 7, 2014, **BRANDON** opened an online storage account with Dropbox. On January 13, 2015, Dropbox reported to NCMEC that 70 digital video files suspected of depicting child pornography had been uploaded to **BRANDON**'s Dropbox account, including the following video, among others:

- **Videcpgs95.wmv** – This file is a one minute 47 second video depicting a Caucasian male receiving oral sex from a nude pre-pubescent Asian female, while a second nude prepubescent Asian female and fully clothed pre-teen Asian female observe. A third nude pre-pubescent Asian female appears later in the video and is seated on the floor exposing her vagina.

On June 23, 2015, federal agents from the Federal Bureau of Investigation executed a search warrant at **BRANDON**'s residence. Agents seized a cellular telephone, flash drives, and a gaming system. The digital media seized on June 23, 2015 contained more than 1,350 images depicting children engaged in sexually explicit conduct. The following is an example of the images and video contained on **BRANDON**'s digital media seized on June 23, 2015:

- **814f7ed9-70d5-4173-a631-86525fd38f5e.mp4** – This file is a one minute 25 second video depicting a nude pre-pubescent Caucasian female sitting in an upright posture, with the words “Fuck Me” and a downward-facing arrow written on her chest and stomach. An adult Caucasian male inserts his penis in the child’s vagina and rubs his penis on her genitals.

During the execution of a federal search warrant at **BRANDON**’s residence on June 23, 2015, federal agents also interviewed **BRANDON**. After waiving his *Miranda* rights, **BRANDON** admitted that he had downloaded and shared child pornography via the Internet using various mediums including, but not limited to, multiple Dropbox and Gmail accounts, as well as Kik, a smartphone messenger application. **BRANDON** also admitted to ownership of the email accounts jdb1000z@gmail.com, hunterj2303@gmail.com and brandonj2303@gmail.com.

As recently as June 2015, **BRANDON** received images of children engaged in sexually explicit conduct, including the following video received by **BRANDON** on June 16, 2015 at email address brandonj2303@gmail.com from an individual using a separate Gmail address:

- **babyshivid-bathtimeinourworld\_all.avi** – This file is a six minute and five second video depicting a nude toddler-aged Caucasian female in a bathtub with a nude Caucasian adult male. At the beginning of the video, the adult male rubs his penis on the child’s face and mouth. The adult male then rubs the child’s vagina while she stands next to him. The video then depicts the adult male attempting to insert his erect penis into the child’s vagina.

On February 9, 2015, **BRANDON**, using the email address brandonj2303@gmail.com, distributed the following video to another individual via email:


- **Toothbrush Masturbation.m4v** – This file is a one minute 26 second video depicting a nude pre-pubescent African American female laying nude on her back with her legs spread apart holding an electric toothbrush against her vagina. An adult African American male, who appears to be filming the child, later takes the toothbrush and places it against the child’s vagina.

The images and videos described above depict real children engaged in sexually explicit conduct. **BRANDON** downloaded and distributed images and videos of child pornography using the Internet, and therefore such images and videos traveled in interstate and foreign commerce.



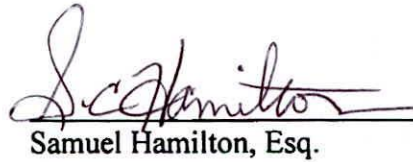
I have read this Statement of Facts, and have carefully reviewed it with my attorney. I understand it, and I voluntarily agree to it. I do not wish to change any part of it. I acknowledge that it is true and correct.

9/27/15  
Date

  
Jamaar Davon Brandon

I am Jamaar Davon Brandon's attorney. I have carefully reviewed every part of this Statement of Facts with him. To my knowledge, his decision to sign it is an informed and voluntary one.

9/27/15  
Date

  
Samuel Hamilton, Esq.